

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

MAR 18 2015

DAVID J. MALAND, CLERK  
BY DEPUTY

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA

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SEALED

v.

NO. 6:15CR 22  
JUDGE MHS/JDL

CHAD HOLLOWELL (01)  
ERICK THOMPKINS (02)  
MELISSA NEVAREZ (03)

**INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**

Violation: 21 U.S.C. § 846 (Conspiracy to possess with intent to distribute methamphetamine)

Beginning on a date unknown to the Grand Jury and continuing thereafter until at least November 12, 2014, in the Eastern District of Texas and elsewhere, **Chad Hollowell, Erick Thompkins, and Melissa Nevarez** defendants charged herein, did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to violate the laws of the United States, to-wit, Title 21, United States Code, Section 841(a)(1), prohibiting the knowing and intentional possession with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine or 50 grams or more of methamphetamine (actual), a Schedule II controlled substance,

All in violation of 21 U.S.C. § 846.

**COUNT 2**

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about September 25, 2014, in the Eastern District of Texas, **Chad Hollowell**, defendant herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

**COUNT 3**

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about September 26, 2014, in the Eastern District of Texas, **Chad Hollowell** and **Erick Thompkins**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

**COUNT 4**

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about September 29, 2014, in the Eastern District of Texas, **Chad Hollowell**, defendant herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

**COUNT 5**

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about October 2, 2014, in the Eastern District of Texas, **Chad Hollowell** and **Melissa Nevarez**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

**COUNT 6**

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about November 12, 2014, in the Eastern District of Texas, **Chad Hollowell**, defendant herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

**COUNT 7**

Violation: 18 U.S.C. § 924(c)  
(Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about November 12, 2014, in the Eastern District of Texas, **Chad Hollowell**, defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute

methamphetamine, a Schedule II controlled substance, as charged in Count 6 of this indictment, and in furtherance of said crime possessed a firearm, in violation of 18 U.S.C. § 924(c).

**COUNT 8**

Violation: 18 U.S.C. § 922(g)  
(Felon in possession of a firearm)

On or about November 12, 2014, in the Eastern District of Texas, **Chad Hollowell**, defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically: Injury to a Child, in Case No. 7-94-875 in the 7th Judicial District Court, Smith County, Texas, on February 26, 1998, Possession of a Controlled Substance, Case No. A10952 in the 173rd Judicial District Court, Henderson County, Texas, Case No. A11654 on June 12, 2003, Possess or Transport Chemicals with Intent to Manufacture Controlled Substance, Case No. 175172003 in the 402nd Judicial District Court, Wood County, Texas, on October 3, 2003, Theft of Property, Case No. A-19,519 in the 402nd Judicial District Court, Wood County, Texas, on October 3, 2003 did knowingly and intentionally possess a firearm, to wit: Hi-Standard, Sentinel, .22 caliber revolver, s/n 1071430 and a North America Arms, .22 caliber ammunition, s/n V05791, which had been shipped and transported in interstate commerce,

All in violation of 18 U.S.C. § 922(g).

**NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE**

Criminal Forfeiture Pursuant to 18 U.S.C. §§ 924(d) and 3665

As a result of committing the felony offenses alleged in this indictment, the defendants shall forfeit to the United States of America, pursuant to 18 U.S.C. §§ 924(d) and 3665, any and all firearms, ammunition and accessories seized from the defendants, including but not limited to the following:

- (1) High Standard Model Sentinel, .22 caliber revolver, serial number V905933M;
- (2) North American Arms Model NAA22, .22 caliber revolver, serial number V05791; and
- (3) 39 rounds of CCI brand, .22 caliber ammunition.

By virtue of the commission of the felony offenses charged in this indictment by the defendants, any and all interest the defendants have in the above-described firearms and/or ammunition is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. §§ 924(d) and 3665.

A TRUE BILL,

3-18-2015

DATE

BK

FOREPERSON OF THE GRAND JURY

JOHN M. BALES  
UNITED STATES ATTORNEY

Bill Baldwin  
BILL BALDWIN  
Assistant United States Attorney

N THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
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**NOTICE OF PENALTY**

**COUNT 1**

Violation: 21 U.S.C. §§ 846 and 841(a)(1)

Penalty: If more than 500 grams of a mixture or substance of methamphetamine or 50 grams of methamphetamine (actual) - not less than 10 years to life in prison, a fine not to exceed \$10,000,000, or both, and supervised release of at least 5 years.

Special Assessment: \$100.00

**COUNTS 2-6**

Violation: 21 U.S.C. § 841(a)(1)

Penalty: No more than 20 years in prison, a fine not to exceed \$1,000,000, or both, and supervised release of at least 3 years.

Special Assessment: \$100.00

**COUNT 7**

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

Penalty: Imprisonment for a term of not less than 5 years or more than life, which must be served consecutively to any other term of imprisonment, a fine not to exceed \$250,000, or both. A term of supervised release of not more than 5 years in addition to such term of imprisonment.

In the case of a second or subsequent conviction of this offense, the term of imprisonment shall not be less than 25 years.

Special Assessment: \$100.00

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**COUNT 8**

Violation: 18 U.S.C. § 922(g)

Penalty: Imprisonment for a term of not more than 10 years, a fine not to exceed \$250,000, or both. A term of supervised release of not more than 3 years.

Special Assessment: \$100.00